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RCRA RECORDS CENTER
FACILITY Boston Edison Co
I.D. NO. MAD008545412
FILE LOC. 12-16
OTHER

TO: Michael R. Deland

Address: USEPA Region I
JFK Federal Building
Room 2203
Boston, Massachusetts 02203

RE: Soft Hammer Demonstration/Certification

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, Uniroyal, Ma Boston Edison has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a)(2) for EPA waste code(s)

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that:

____ 1.) No practically available treatment exists. See attached demonstration for further details.

__A__ 2.) (insert treatment(s) is the best practically available treatment (see attached demonstration for further details).

If any further information is required, please contact me at

Boston Edison Company (617) 424-2055
480 Arsenal Street
Watertown, Ma 02172

Done for Raytheon Ruphus C Aldridge
Signature

SOFT HAMMER DEMONSTRATION

FACILITY.OWNER	LOCATION	TREATMENT METHOD	TELEPHONE	CONTACT	DATE	EXPLANATION*
1. CWM Resource Recovery, Inc.	P.O. Box 453 West Carrollton OH 45449	Fuel Recovery	(513)859-6101	Sue Anderson		Not Permitted
2. Thermal Chem Inc	PO Box 664 Rockhill, SC	Incineration	(803) 329-9690	Belinda Wright		A
3. CWM Chemical Services, Inc.	1550 Balmer Road Model City, NY 14107	Landfill	(716)754-8231	Jill Knickerbocker		Forbidden by law

ATTACHMENT 4
FIRST THIRD "SOFT-HAMMER DEMONSTRATION
Soft-Hammer Waste For Which Alternative Treatment or Recovery Has Been Located

A — Rotary Kiln Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally organic residues which are best destroyed by incineration.

B — Liquid Injection Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally pumpable organic residues which are best destroyed by incineration.

C — Fuels Blending is a practically available technology that yields the greatest environmental benefit. This waste has a heating value greater than or equal to 5,000 BTU per pound and can be best reused as a hazardous waste fuel.

D — A combination of Fuels Blending, and/or Rotary Kiln or Liquid Injection is a practically available technology that yields the greatest environmental benefit. This is due to the properties of my waste which may vary slightly, from one load to the next. Solid nondispersible residues will need to be incinerated; but the pumpable or dispersible portions may be blended for hazardous waste fuels usage (when the BTU's, chlorine, ash, etc. are within the required ranges); or else incinerated.

E — Chemical Precipitation (with filtration or decanting) is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volume of the waste.

F — Filtration is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volumes of the waste.

G — Stabilization is a practically available technology that yields the greatest environmental benefit. Stabilization will reduce the mobility of the hazardous constituents of the waste. I have examined recovery and destruction technologies an found that they were not practically available for the following reason(s):

H — Chemical oxidation is a practically available technology that yields the greatest environmental benefit. Chemical oxidation will reduce the toxicity of hazardous constituents in the waste.

This waste is not suitable for incineration or fuels due to:

I — the low percentage of hazardous organic constitutents presents,
J — the low heating value of the waste,
K — the high percentage of inorganic constituents present,
L — the lack of located available capacity of incineration or fuels blending facilities.

This waste is not suitable for recovery due to:

M — The hazardous constituents are present in concentations that make recovery technologically impossible.
N — The hazardous constituents are present in concentrations that make recovery economically infeasible.
O — No recovery facilities were located that could treat this type of waste.
P — No recovery facilities were located that had capacity to treat this type of waste.

Q — The treatment technology identified above is a past practice that has been demonstrated to meaningfully reduce the toxicity and/or mobility of the waste.

Additional Comments: